

DASHOD REED #1106921

Name and Inmate Booking Number

HIGH DESERT STATE PRISON

Place of Confinement

P.O. BOX 650

Mailing Address

Indian Springs NV 89070

City, State, Zip Code

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADADASHOD REED

Plaintiff

vs.

(1) PERRY RUSSELL,  
see additional pages for  
(2) DEFENDANTS,  
(3) \_\_\_\_\_,  
(4) \_\_\_\_\_,  
(5) \_\_\_\_\_,

Defendant(s).

Case No. 2:22-cv-00537-RFB-BNW(To be supplied by Clerk of Court)  
2nd Amended Complaint  
CIVIL RIGHTS COMPLAINT  
BY AN INMATE

Original Complaint  
 First Amended Complaint  
 Second Amended Complaint

 Jury Trial Demanded

## A. JURISDICTION

1) This Court has jurisdiction over this action pursuant to:

28 U.S.C. § 1343(a)(3); 42 U.S.C. § 1983  
 28 U.S.C. § 1331; *Rivers v. Six Unknown Named Agents*, 403 U.S. 388 (1971)  
 Other: Additional jurisdiction exist based on a federal question

2) Institution/city where Plaintiff currently resides: HIGH DESERT STATE PRISON

3) Institution/city where violation(s) occurred: NORTHERN NEVADA CORR. CENTER

- 1 PERRY RUSSELL,
2. RON ABELOE,
3. JEREMY COLTRIN,
- 4 WING,
5. SHERRY CONLIN,
- 6 WILLIAM MILLER,
- 7 JEANIE KYLE-ELLENDER,
- 8 KEVIN GILL,

Defendant(s).

**B. DEFENDANTS**

1. Name of first Defendant: Perry Russell . The first Defendant is employed as:  
WARDEN at Northern Nevada Corr. Center .  
 (Position of Title) (Institution)

2. Name of second Defendant: RON ABELOE . The second Defendant is employed as:  
INVESTIGATOR at Northern Nevada Corr. Center .  
 (Position of Title) (Institution)

3. Name of third Defendant: JEREMY COLTRIN . The third Defendant is employed as:  
INVESTIGATOR at Northern Nevada Corr. Center .  
 (Position of Title) (Institution)

4. Name of fourth Defendant: WING . The fourth Defendant is employed as:  
Correctional Officer ("C/D") at Northern Nevada Corr. Center .  
 (Position of Title) (Institution)

5. Name of fifth Defendant: SHERRY CONLIN . The fifth Defendant is employed as:  
CASEWORKER at Northern Nevada Corr. Center .  
 (Position of Title) (Institution)

If you name more than five Defendants, answer the questions listed above for each additional Defendant on a separate page.

**C. NATURE OF THE CASE**

Briefly state the background of your case.

Defendants, and all persons acting in concert with them have created a systemic, unconstitutional custom to punish and suppress inmates exercise of their first amendment USC right; to petition for redress of grievances by cloaking retaliatory acts in "neutral procedures" and in doing so give their adverse acts the artificial appearance of legal.

## B. DEFENDANTS

**B. DEFENDANTS**

1. Name of <sup>Sixth</sup> first Defendant: WILLIAM MILLER. The <sup>first</sup> Defendant is employed as: LIEUTENANT ("LT.") at Northern Nevada Corr. Center.  
 (Position of Title) (Institution)

2. Name of <sup>seventh</sup> second Defendant: JEANIE KYLE-ELLENDER <sup>seventh</sup>. The <sup>second</sup> Defendant is employed as: REGISTERED NURSE ("RN") at Northern Nevada Corr. Center.  
 (Position of Title) (Institution)

3. Name of <sup>Eighth</sup> third Defendant: KEVIN GILL <sup>Eighth</sup>. The <sup>third</sup> Defendant is employed as: INFORMANT at Northern Nevada Corr. Center.  
 (Position of Title) (Institution)

4. Name of fourth Defendant: \_\_\_\_\_ . The fourth Defendant is employed as:  
 \_\_\_\_\_ at \_\_\_\_\_.  
 (Position of Title) (Institution)

5. Name of fifth Defendant: \_\_\_\_\_ . The fifth Defendant is employed as:  
 \_\_\_\_\_ at \_\_\_\_\_.  
 (Position of Title) (Institution)

If you name more than five Defendants, answer the questions listed above for each additional Defendant on a separate page.

### C. NATURE OF THE CASE

Briefly state the background of your case.

## D. CAUSE(S) OF ACTION

## CLAIM 1

1. State the constitutional or other federal civil right that was violated: FIRST AMENDMENT  
USC; right to petition for redress.

2. Claim 1. Identify the issue involved. Check only one. State additional issues in separate claims.

<input type="checkbox"/> Basic necessities	<input type="checkbox"/> Medical care	<input type="checkbox"/> Mail
<input type="checkbox"/> Disciplinary proceedings	<input type="checkbox"/> Exercise of religion	<input type="checkbox"/> Property
<input type="checkbox"/> Access to the court	<input type="checkbox"/> Excessive force by officer	<input checked="" type="checkbox"/> Retaliation
<input type="checkbox"/> Threat to safety	<input type="checkbox"/> Other: _____	

3. Date(s) or date range of when the violation occurred: June 2020 - June 23 2021

4. Supporting Facts: State as briefly as possible the FACTS supporting Claim 1. Describe exactly what each specific defendant (by name) did to violate your rights. State the facts clearly in your own words without citing legal authority or argument.

STATEMENT OF FACTS

- 1.) At all times here, and after the Plaintiff, Dashad Reed ("Reed") is incarcerated in the Nevada Department of Corrections ("NDOC");
- 2.) May 19<sup>th</sup>, 2020 to assist medical staff during the Covid-19 pandemic, and as a safeguard to prevent the potential spread of the virus among the prison population - Reed was moved to the Infirmary / Unit 8A to be housed as a live in Bio-Porter;
- 3.) During this time, Defendant JEANIE KYLE ELLENDER ("Defendant Jeanie") began making racial and sexually inappropriate remarks to the plaintiff, such as:
- 4.) "My husband Adam can't cook, but it's okay cause he's good in the sack"; how her husband was "black from the waist down"; and she also talked to Reed about the sexual energy needed to be married to someone fifteen years her junior;
- 5.) Reed sternly responded to Defendant Jeanie's inappropriate remarks the final time he "[does] not want to hear that"; and reminded Defendant Jeanie "[she was] not suppose to be talking to him like that";

- 6.) Defendant Jeanie (appx at the end of June, 2020) almost immediately began acting adversely toward Reed for his complaint, in the form of filing false reports of misconduct to multiple Infirmary Unit 8A Officers;
- 7.) Defendant Jeanie alleged to Officers, Reed "was stealing" from inmate/patient Stanley Butler; Defendant Jeanie alleged Reed was "taking inmate Jerry Johnsons' medication"; Defendant Jeanie also alleged Reed was using the Infirmary Bio-hazard bins to "make wine";
- 8.) Defendant Jeanie's allegations all, ultimately turned out to be false; causing the Plaintiff, Reed to have to work and defend himself in a adversial setting;
- 9.) Unit 8A Officers after reviewing Institutional cameras, and interviewing inmates determining Defendant Jeanie had lied, told Reed "stay away from Jeanie";
- 10.) Reed filed a grievance against Defendant Jeanie; submitting his first level appeal February 23, 2021, it was stamped "RECEIVED" by the Infirmary March 8<sup>th</sup>, 2021;
- 11.) March 9<sup>th</sup>, 2021 after Reed worked his shift in 8C/ Medical with-out incident, Officer Wing ("Defendant Wing") an 8C officer - called Reed's housing unit and told Officer Brendal to relay to Reed that he "had been terminated";
- 12.) Reed confirmed his termination through unit 2

[12, continued] caseworker Olivia Agle after she emailed Infirmary Caseworker, Sherry Conlin ("Defendant Conlin"), Reed was assured he had been terminated (with-out explanation);

13.) Senior Officer, Herzog told Reed he "was briefed" by Defendant Conlin at the beginning of his shift on March 9<sup>th</sup>, 2021 that she "thought it was best to terminate Reed";

14.) Herzog informed Reed, that he advised Conlin, "she could not do that because it was retaliation"

15.) Defendant Conlin then emailed Olivia Agle; rehiring and reassigning Reed to Unit 8B, Mental Health Unit ("8B/MHU"). A less favorable position, in an attempt to compel Reed to quit;

16.) On March 10<sup>th</sup>, 2021 Reed was reporting to his new work assignment in 8B/MHU, when he was stopped in the 8C, inmate waiting room by Officer Hawk and Defendant Wing;

17.) Defendant Wing at that time expressed to Reed that he was terminated on March 9<sup>th</sup>, 2021 because he "was told by the Warden to deal with [Reed]", because "nursing staff was uncomfortable around [Reed]"; and threatened Reed that he "should just resign, before things got worse". Reed refused to resign.

18.) This exchange was captured on the Institutions surveillance system.

19.) March 11<sup>th</sup>, 2021 Reed submitted a inmate

[19, continued] request form to Warden Perry Russel ("Defendant Russell") to inform him of staffs allegations and also inform him of on going and future retaliatory plans of prison officials to suppress and punish Reed for the exercise of his first amendment;

20.) March 15<sup>th</sup> 2021 Defendant Russell responded to Reed's inmate request form stating, "I have not said anything concerning you to anyone"; and asked Reed "who told you this";

21.) On June 23 2021 Investigators Ron Abeloe ("Defendant Abeloe") and Jeremy Coltrin ("Defendant Coltrin") transferred Reed to segregation, minutes after colluding and conspiring with inmate Kevin Gill ("Defendant Kevin Gill") who deliberately falsely reported he "purchased drugs from Reed" through a 3rd party inmate named "Flame." (Christopher Dillon);

22.) Defendant Kevin Gill alleged he "completed transaction through [Christopher Dillon]", that he "did not deal with Reed"; and he had only "heard" the information he was relaying to Defendants Abeloe and Coltrin;

23.) Christopher Dillon was not transferred to segregation

24.) Weeks later Defendants Abeloe and Coltrin to rehabilitate their arbitrary and

[24,continued] capricious decision to transfer Reed to segregation, deviating from normal prison procedure, with out any corroboration or a good faith investigation, to deem Defendant Kevin Gill as "credible" tailored a Investigative Report with false and exaggerated inculpatory statements, that Defendant Coltrin stated came from "multiple sources";

25.) There is no documented statements or reports from these alleged "multiple sources" prior to Reed being transferred to segregation;

26.) December 7<sup>th</sup>, 2021 Defendant Abeloe came to speak with Reed in segregation; and told Reed that he "would be criminally charged";

27.) Reed, demanded a polygraph test, and advised Defendant Abeloe of his plan to file suit and that "(Reed) Knew that the 'Investigation' was in retaliation for him filing grievances";

28.) Defendant Abeloe responded to Reed, stating "[Reed] can sue Coltrin, but good luck suing me, I wasn't dumb enough to file a report";

29.) After 8 months in segregation the Plaintiff was transferred to another prison; and the investigation was dropped with out Reed being charged with any Institutional infraction or the promised "criminal

[29, continued] charges; because the allegations were false and improperly motivated to remove Reed from his job in the Medical building after he filed a grievance against Defendant Jeanie that lead to a suspension; 30.) Subsequently, after Reed was transferred to segregation Defendants Abeloe and Coltrin confiscated Reed's property without complying with and observing department regulations;

31.) July 24<sup>th</sup>, 2021 Reed filed an informal complaint with the property Sgt. (Sgt. Woods); 3 days later on July 27<sup>th</sup>, 2021 Defendant Coltrin alleging the Plaintiff's property was "excessive" issued Reed a adverse, false, and exaggerated Notice of Charges ("NOC"), for "failure to follow rules and regulations" (G-14);

32.) Defendant Coltrin's NOC was issued 34 days outside the time frame mandated by department rules and regulations to issue inmates NOCs;

35.) Lt. William Miller ("Defendant Miller") personally examined Reed's property and conceded it was not excessive;

36.) Defendant Miller was also aware: Reed's property was searched one week prior to being transferred (Officer who

[36,continued] executed search did not deem Reed's property as excessive ;

37.) Defendant Miller was aware, Defendant Coltrin lodged a NOC 34 days outside mandated department time frame ;

38.) Defendant Miller was aware "excessive property" is not prohibited conduct ; and the NDOC has a post-deprivation remedy aimed at penological goal of handling "excessive property" ;

39.) Reed also provided proof of ownership for the improperly confiscated property ;

40.) Defendant Miller to immunize Defendant Coltrin from liability, coerced Reed to plead to the adverse and false NOC ; telling the Plaintiff, Reed he "needed to plead guilty in exchange for the return of his property" ;

41.) On November 4<sup>th</sup> 2021 Defendant Miller returned the Plaintiff, Reed his property at his disciplinary hearing ;

42.) Defendant Miller falsified the NOC disposition stating, "the property was forfeited."

43.) The Defendants and other malefactors have perfected a systemic, mafia style tactic that masquerades neutral procedures as a front for adverse acts, allowing the

[43, continued] line of demarcation between retaliation and maintaining safety and security to be effectively blurred;

### Cause of Action- Claim 1

44.) Plaintiff incorporates paragraphs 1 through 43 as though they were stated fully herein.

45.) Defendant Jeanie's submission of multiple false complaints of misconduct to Unit 8A officers, after Plaintiff complained about her discriminatory and sexual remarks, constituted retaliation and violated the Plaintiff's first Amendment right;

46.) Defendant Jeanie campaigning for retaliation, violated the plaintiff's first amendment right.;

47.) Defendant Conlins and Defendant Wing terminating the Plaintiff in temporal proximity to-and for the exercise of his right to petition for redress of grievances violated the Plaintiff's first amendment and constitutes

[47, continued] retaliation;

48.) Defendant Conlin transferring the Plaintiff to 8B, to create a conflict in his schedule and compel him to quit for exercising his first amendment, constitutes retaliation;

49.) Defendant Wings threat that the Plaintiff, Reed "should just resign before things got worse", without cause violates the Plaintiff's first amendment and constitutes retaliation;

50.) Defendant/s Abeloe, Coltrin and Kevin Gill colluded, and conspired to weaponize the neutral procedure "Investigation" as part of an elaborate and cleverly devised ruse to silence and punish Reed for the exercise of his first amendment right to petition for redress; with the dual purpose of removing him from his job in the medical building, constitutes retaliation;

51.) The aforementioned acts and omissions were a collusive and conspiratorial effort by the above named defendants

[5],continued] that subjected the Plaintiff, Reed to a risk of significant sanctions even criminal charges;

52.) The antagonistic pattern of adverse acts by the Defendants both individually and collectively chilled the Plaintiff's speech or would have chilled the speech of a ordinary person and did not advance a legitimate penological objective;

53.) Defendant Russell was the head administrator at NNCC when Reed was transferred to segregation "Pending Investigation" and at all times relevant to this complaint.

54.) Reed explicitly expressed his fear of staff's plan to use "Investigation" to silence and "punish" him for the exercise of protected conduct to Defendant Russell in March, 2021; Defendant Russell was deliberately Indifferent to Reed's plea to "stop the ongoing effort to retaliate against [him]"; Defendant Russell had the authority to not impose or maintain the retaliatory discipline against the Plaintiff, Reed - he chose to impose and maintain it, acquiescing to the violation at issue;

**CLAIM 2**

1. State the constitutional or other federal civil right that was violated: 14th Amendment  
VSC ; right to due process

2. **Claim 2** Identify the issue involved. Check **only one**. State additional issues in separate claims.

<input type="checkbox"/> Basic necessities	<input type="checkbox"/> Medical care	<input type="checkbox"/> Mail
<input type="checkbox"/> Disciplinary proceedings	<input type="checkbox"/> Exercise of religion	<input type="checkbox"/> Property
<input type="checkbox"/> Access to the court	<input type="checkbox"/> Excessive force by officer	<input type="checkbox"/> Retaliation
<input type="checkbox"/> Threat to safety	<input type="checkbox"/> Other: _____	

3. Date(s) or date range of when the violation occurred: June 23 2021 - Feb 22 2022

4. **Supporting Facts:** State as briefly as possible the FACTS supporting Claim 2. Describe exactly what **each specific defendant (by name)** did to violate your rights. State the facts clearly in your own words without citing legal authority or argument.

**CAUSE OF ACTION-Claim 2**

55.) Plaintiff incorporates paragraphs 1 through 43 as though they were stated fully herein.

56.) Defendants Abeloe and Coltrin transferring the Plaintiff to segregation based on the uncorroborated hearsay statement of a confidential informant, violated the Plaintiff's right to due process;

57.) Defendants Abeloe and Coltrin tailoring a investigation report with false, and exaggerated inculpatory statements violated the Plaintiff's right to due process

58.) Both the retaliation, supra, and denial of due process has caused substantial harm to the

If you assert more than three claims, answer the questions listed above for each additional claim on a separate page.

[58,continued] Plaintiff, Reed. Reed has suffered deprivations including:

1.) The loss of privileges and quality of life attendant upon Plaintiff's confinement for 8 months in the restrictive conditions of the segregated housing unit, and exclusion from normal prison activities and privileges associated with the confinement, in that he was confined to a cell only coming out every two days and deprived of his personal property as well as the ability to work and continue to pursue his college education, associate with other prisoners, attend outdoor recreation in a congregate setting with the ability to engage in sports and other recreational activities, attend meals with other prisoners and attend religious services.

2.) The economic loss from the Plaintiff's exclusion from his paid employment in the prison during his confinement in the segregated housing unit.

## CLAIM 3

1. State the constitutional or other federal civil right that was violated: first Amendment  
VSC; right to petition for redress

2. **Claim 3.** Identify the issue involved. Check **only one**. State additional issues in separate claims.

<input type="checkbox"/> Basic necessities	<input type="checkbox"/> Medical care	<input type="checkbox"/> Mail
<input type="checkbox"/> Disciplinary proceedings	<input type="checkbox"/> Exercise of religion	<input type="checkbox"/> Property
<input type="checkbox"/> Access to the court	<input type="checkbox"/> Excessive force by officer	<input checked="" type="checkbox"/> Retaliation
<input type="checkbox"/> Threat to safety	<input type="checkbox"/> Other: _____	

3. **Date(s) or date range** of when the violation occurred: July 27, 2021 - Nov 4<sup>th</sup>, 2022

4. **Supporting Facts:** State as briefly as possible the FACTS supporting Claim 3. Describe exactly what **each specific defendant (by name)** did to violate your rights. State the facts clearly in your own words without citing legal authority or argument.

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### CAUSE OF ACTION - Claim 3

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59.) Plaintiff incorporates paragraphs 30 through 43 as though they were stated fully herein.

60.) Defendant Coltrins confiscation of the Plaintiff's property with-out complying with and observing department regulations was to defraud Reed of his property for the exercise of his first amendment right; constitutes retaliation;

61.) Defendant Coltrin issuing the Plaintiff a NOC 34 days outside the departments mandated time frame was an exaggerated response to the Plaintiff's exercise of his first Amendment;

If you assert more than three claims, answer the questions listed above for each additional claim on a separate page.

[61,continued] constitutes a retaliatory adverse act ;

62.) Defendant Cottrins deviation from normal prison procedure regarding alleged "excessive property", in temporal proximity to the Plaintiff's complaint, violated the Plaintiff's first amendment right and constitutes retaliation ;

63.) Defendant Cottrin's false NOC for "excessive property" chilled the plaintiff's speech, because it was solely based on retaliation and did not further a legitimate penological interest ;

## CLAIM 4

1. State the constitutional or other federal civil right that was violated: 14th Amendment  
USC; right to due process

2. **Claim 4:** Identify the issue involved. Check **only one**. State additional issues in separate claims.

<input type="checkbox"/> Basic necessities	<input type="checkbox"/> Medical care	<input type="checkbox"/> Mail
<input checked="" type="checkbox"/> Disciplinary proceedings	<input type="checkbox"/> Exercise of religion	<input type="checkbox"/> Property
<input type="checkbox"/> Access to the court	<input type="checkbox"/> Excessive force by officer	<input type="checkbox"/> Retaliation
<input type="checkbox"/> Threat to safety	<input type="checkbox"/> Other: _____	

3. Date(s) or date range of when the violation occurred: July 27 2021 - Nov 4th 2021

4. **Supporting Facts:** State as briefly as possible the FACTS supporting Claim 4. Describe exactly what **each specific defendant (by name)** did to violate your rights. State the facts clearly in your own words without citing legal authority or argument.

## CAUSE OF ACTION - Claim 4

(64.) Plaintiff incorporates paragraphs 30 through 45 as though they were stated fully herein.

(65.) Defendant Coltrin vague NOC for "failure to follow rules and regulations" violates Plaintiff's right to due process because it does not sufficiently define what conduct is prohibited;

(66.) Defendant Coltrins NOC for "failure to follow rules and regulations" violated Plaintiff's right to due process, Reed was not given fair notice that "excessive property" was prohibited; conduct

(67.) Defendant Millers conscious disregard of Plaintiff's

If you assert more than three claims, answer the questions listed above for each additional claim on a separate page.

[67, continued] exculpatory evidence to immunize Defendant Coltrin from liability violates plaintiff's right to due process;

68.) Defendant Miller coercing the Plaintiff to plea to a NOC that is not a infraction to any established Institution rule, violates plaintiff right to due process;

69.) Defendant Miller's false NOC disposition that the property at issue was "forfeited", to foreclose Reed from grieving Cottrells false misconduct report, violates Plaintiff's right to due process;

70.) Defendant Miller and Defendant Cottrells acts and omissions, was not rationally related to any penological goal.

71.) Defendant/s Russell; Abeloe; Coltrin; Wing; Conlin; Miller; and Jeanie are being sued in both their individual and official capacity;

72.) Defendant Kevin Gill is being sued in his individual capacity;

73.) Consistent with 42 U.S.C § 1997e(e)  
the plaintiff does not seek additional  
damages for mental or emotional injury  
resulting from the above described injuries.

## E. PREVIOUS LAWSUITS

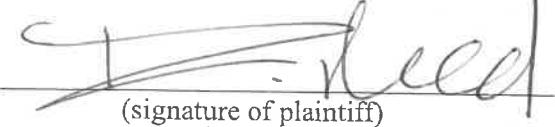
1. Have you filed any other lawsuits while incarcerated?  Yes  No
2. Has this Court or any other court designated you as subject to "three strikes" under 28 U.S.C. § 1915(g)?  Yes  No
3. If you have "three strikes" under 28 U.S.C. § 1915(g), does this complaint demonstrate that you are "under imminent danger of serious physical injury?"  N/A  Yes  No

## F. REQUEST FOR RELIEF

I believe I am entitled to the following relief: Compensatory Damages: \$100,000<sup>00</sup>;  
loss of wages; \$2,500 per month in segregation; Punitive Damages:  
\$10,000<sup>00</sup> per defendant; Declaratory: Acts and Omissions of  
defendants violated PHF's Constitutional rights, and Federal law;  
Injunction: Expungement of all material related to this complaint in  
PHF's institutional file; Better safeguards against retaliation; any  
other relief deemed appropriate by this court; Cost, fees and  
Attorney fees.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

(name of person who prepared or helped prepare this complaint if not the plaintiff)

  
 (signature of plaintiff)

5/16/23  
 (date)

## ADDITIONAL PAGES

You must answer all questions concisely in the proper space on the form. Your complaint may not be more than 30 pages long. It is not necessary to attach exhibits or affidavits to the complaint or any amended complaint. Rather, the complaint or any amended complaint must sufficiently state the facts and claims without reference to exhibits or affidavits. If you need to file a complaint that is more than 30 pages long, you must file a motion seeking permission to exceed the page limit and explain the reasons that support the need to exceed 30 pages in length.

INDEX OF EXHIBITSExhibit Number 1Number of Pages 4Exhibit Description GRIEVANCE No. 20063111774 (informal)Exhibit Number 2Number of Pages 4Exhibit Description " ( 1<sup>st</sup> level )Exhibit Number 3Number of Pages 4Exhibit Description " ( 2<sup>nd</sup> level )Exhibit Number 4Number of Pages 3Exhibit Description INMATE REQUEST FORM / COMPLAINT TO ABELOEExhibit Number 5Number of Pages 1Exhibit Description EMAIL FROM MS. CONLIN TO AGLEExhibit Number 6Number of Pages 3Exhibit Description INMATE REQUEST FORM / COMPLAINT (PERRY RUSSELL)Exhibit Number 7Number of Pages 1Exhibit Description INMATE REQUEST FORM / COMPLAINT TO: SGT. WOODSExhibit Number 8Number of Pages 1Exhibit Description INMATE REQUEST FORM / COMPLAINT TO: SGT WOODSExhibit Number 9Number of Pages 1Exhibit Description INMATE REQUEST FORM / COMPLAINT TO: SGT WOODSExhibit Number 10Number of Pages 1Exhibit Description INMATE REQUEST FORM / COMPLAINT; CORRESPONDENCE WITH LT. MILLERExhibit Number 11Number of Pages 2Exhibit Description INMATE REQUEST FORM / COMPLAINTS TO: ADAMS

INDEX OF EXHIBITS

Exhibit Number 12 Number of Pages 1  
 Exhibit Description SWORN DECLARATION: Christopher Dillon

Exhibit Number 13 Number of Pages 1  
 Exhibit Description INMATE REQUEST FORM TO: I.G. OFFICE.

Exhibit Number 14 Number of Pages 1  
 Exhibit Description NOTICE OF CHARGES (NOC) issued by Coffrin.

Exhibit Number \_\_\_\_\_ Number of Pages \_\_\_\_\_  
 Exhibit Description \_\_\_\_\_

Exhibit Number \_\_\_\_\_ Number of Pages \_\_\_\_\_

Exhibit Description \_\_\_\_\_

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Exhibit Description \_\_\_\_\_

Exhibit Number \_\_\_\_\_ Number of Pages \_\_\_\_\_

Exhibit Description \_\_\_\_\_

**EXHIBIT 1**

The Plaintiff, Dashod Reed's  
Grievance No. 2006 311 1774  
(informal) against Defendant  
Jeanie Kyle Ellender.

SUBMITTED December 7, 2020

**EXHIBIT 1**



**State of Nevada  
Department of Corrections**

2A 4A

**INMATE GRIEVANCE REPORT**

**ISSUE ID#** 20063111774

**ISSUE DATE:** 12/11/2020

<b>INMATE NAME</b>		<b>NDOC ID</b>	<b>TRANSACTION TYPE</b>	<b>ASSIGNED TO</b>
REED, DASHOD EVEREST		1106921	RTRN_INF	HSKULSTAD
<b>LEVEL</b>	<b>TRANSACTION DATE</b>	<b>DAYS LEFT</b>	<b>FINDING</b>	<b>USER ID</b>
IF	02/11/2021	4	Partially Granted	HSKULSTAD

**INMATE COMPLAINT**

**OFFICIAL RESPONSE**

Per AR 740, this grievance has been forwarded to the Office of the Inspector General for investigation. Your grievance is partially granted.

**GRIEVANCE RESPONDER**

Report Name: NVRIGR

Reference Name: NOTIS-RPT-OR-0217.4

Run Date: FEB-11-21 01:31 PM

Page 1 of 1

A-009

Log Number 200631 11774NEVADA DEPARTMENT OF CORRECTIONS  
INFORMAL GRIEVANCENAME: Dashad ReedI.D. NUMBER: 1106921INSTITUTION: NNCC

UNIT: \_\_\_\_\_

GRIEVANT'S STATEMENT: Nurse Jeanie routinely made inappropriate sexual remarks, and demonstrated discriminatory behavior towards me. She progressively accused me of misconduct. With out cause she accused me of "stealing" and "hustling" inmate Butler; Making "wine" in a bio-bin (under a camera, in front of a Nurses station); and she also accused me of taking inmate Johnson's

## SWORN DECLARATION UNDER PENALTY OF PERJURY

INMATE SIGNATURE: D. Reed DATE: 12/1/20 TIME: 1:34 amGRIEVANCE COORDINATOR SIGNATURE: BB DATE: 12/11/20 TIME: 10:38GRIEVANCE RESPONSE: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CASEWORKER SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

   GRIEVANCE UPHELD    GRIEVANCE DENIED    ISSUE NOT GRIEVABLE PER AR 740GRIEVANCE COORDINATOR APPROVAL: BB DATE: 2/12/2021   INMATE AGREES   INMATE DISAGREESINMATE SIGNATURE: D. Reed DATE: 2-23-21

FAILURE TO SIGN CONSTITUTES ABANDONMENT OF THE CLAIM. A FIRST LEVEL GRIEVANCE MAY BE PURSUED IN THE EVENT THE INMATE DISAGREES.

Original:	To inmate when complete, or attached to formal grievance	RECEIVED
Canary:	To Grievance Coordinator	DEC 08 2020
Pink:	Inmate's receipt when formal grievance filed	
Gold:	Inmate's initial receipt	

RECEIVED

DEC 08 2020

NNCC

Rec'd 12/8/20

A-070

@ 3:35 PM

DOC 3091 (12/01)

ATT-00009

**NEVADA DEPARTMENT OF CORRECTIONS**  
**GRIEVANT'S STATEMENT CONTINUATION FORM**

NAME: Dashad Reed I.D. NUMBER: 1106921  
 INSTITUTION: NNCC UNIT #: 5  
 GRIEVANCE #: \_\_\_\_\_ GRIEVANCE LEVEL: informal  
 GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 3

medication. There was no evidence for these allegations - and although the other porter Taaffe had opportunity to commit the same misconduct she accused me of, she never accused him. The only objective difference between me and Taaffe is he's white, and I'm black.

She talks about the sexual energy needed, and the sexual benefits of her being married to someone 15 years her junior. (nearly causing me to vomit), and instant distress from the mental picture.

During another conversation she told me her husband "Adam couldn't cook" but went on to talk about how he pleases her sexually - and that he is "black from the waist down".

Nurse Jeanie also told me I give her "Shady vibes" like Sam (a black nurse) who she refers to as "The Pervert"

Remedy: I want <sup>to</sup> file a PREA claim against Jeanie - because I never gave her the slightest inclination it was okay to talk to me about her sex life, or the size of

Original: Attached to Grievance  
 Pink: Inmate's Copy

NEVADA DEPARTMENT OF CORRECTIONS  
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME: Dashod Reed I.D. NUMBER: 110692J

INSTITUTION: NNCC UNIT #: 5

GRIEVANCE #: \_\_\_\_\_ GRIEVANCE LEVEL: informal

GRIEVANT'S STATEMENT CONTINUATION: PG. 3 OF 3

her husband's penis. Also, I have never disrespected Jeanie, I want her disciplined for the racial discrimination that lacks justification - I would like to know in your response why I was constantly accused by Jeanie; and she falsely reported these things to Unit officers. If race is not reason for the "Shady vibes" - I would like to know what is?

In addition to this can you please forward the content of this complaint to the Nursing Board.

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Original: Attached to Grievance  
Pink: Inmate's Copy

**EXHIBIT 2**

The Plaintiff, Dashad Reed's  
GRIEVANCE No. 2006 311 1774  
(first level) against Defendant  
Jeanie

SUBMITTED: February 23, 2021

**EXHIBIT 2**



**State of Nevada  
Department of Corrections**

**INMATE GRIEVANCE REPORT**

2 A4A

**ISSUE ID#** 20063111774

**ISSUE DATE:** 12/11/2020

<b>INMATE NAME</b>		<b>NDOC ID</b>	<b>TRANSACTION TYPE</b>	<b>ASSIGNED TO</b>	
REED, DASHOD EVEREST		1106921	RTRN_L1	DRICHARD	
<b>LEVEL</b>	<b>TRANSACTION DATE</b>	<b>DAYS LEFT</b>	<b>FINDING</b>	<b>USER ID</b>	<b>STATUS</b>
1	03/10/2021	4	Partially Granted	DRICHARD	A

**INMATE COMPLAINT**

**OFFICIAL RESPONSE**

Mr. Reed, per AR 740.03(2), all PREA related grievances involving staff are referred immediately to the Inspector General's office. This was done at the informal level. Your second stated remedy is to report a staff member to their licensing board. It is your right to make a complaint to any licensing board you wish; however, it is not the NDOC's responsibility to do this for you.

*D. Reed*  
D. Reed  
3-18-21

GRIEVANCE RESPONDER

Report Name: NVRIGR

Reference Name: NOTIS-RPT-OR-0217.4

Run Date: MAR-11-21 09:16 AM

Page 1 of 1

A-005

Log Number

2086311774

NEVADA DEPARTMENT OF CORRECTIONS  
FIRST LEVEL GRIEVANCENAME: Dashad Reed I.D. NUMBER: 1106927INSTITUTION: NNCC UNIT: 2AI REQUEST THE REVIEW OF THE GRIEVANCE, LOG NUMBER 2086311774, IN A FORMAL MANNER. THE ORIGINAL COPY OF MY GRIEVANCE AND ALL SUPPORTING DOCUMENTATION IS ATTACHED FOR REVIEW.

## SWORN DECLARATION UNDER PENALTY OF PERJURY

INMATE SIGNATURE: D Reed DATE: 2/23/21WHY DISAGREE: I have long ago come to the conclusion that staff rarely finds (other) staff guilty of misconduct. EVERYTHING I alleged in my informal grievance is 100% true. Nurse Jeanie's harassment toward me became so blatantGRIEVANCE COORDINATOR SIGNATURE: DD DATE: 3/4/21FIRST LEVEL RESPONSE: Partially GrantedGRIEVANCE UPHELD  GRIEVANCE DENIED  ISSUE NOT GRIEVABLE PER AR 740WARDEN'S SIGNATURE: Yee TITLE: Dons-L DATE: 3/11/21GRIEVANCE COORDINATOR SIGNATURE: DD DATE: 3/17/2021INMATE AGREES  INMATE DISAGREES INMATE SIGNATURE: D Reed DATE: 3/18/21

FAILURE TO SIGN CONSTITUTES ABANDONMENT OF THE CLAIM. A SECOND LEVEL GRIEVANCE MAY BE PURSUED IN THE EVENT THE INMATE DISAGREES.

Original:	To inmate when complete, or attached to formal grievance
Canary:	To Grievance Coordinator
Pink:	Inmate's receipt when formal grievance filed
Gold:	Inmate's initial receipt

RECEIVED

FEB 26 2021

NNCC

MAR 08 2021

RMF

**NEVADA DEPARTMENT OF CORRECTIONS**  
**GRIEVANT'S STATEMENT CONTINUATION FORM**

NAME: Dashad Reed I.D. NUMBER: 1106921  
 INSTITUTION: NNCC UNIT #: 2A  
 GRIEVANCE #: \_\_\_\_\_ GRIEVANCE LEVEL: 1<sup>st</sup>  
 GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 3

and irritating even custody officers would ask me "what did I do to her?"; Officers such as Sencion, Stenerson, and officer Matteson who asked me to "stay away from her as best as I could" because she "had it out for me." She constantly made sexually inappropriate remarks even after I told her "I did not want to hear that." I am certain she is a racist and will not have a reasonable answer why she harassed me, even falsely reporting to officers misconduct regarding me that never happened. I enjoyed my job in 8A but had to change job assignments out of fear she may succeed in her campaign of harassment. There is not an iota of evidence or legitimacy to her claims aside from discrimination.

Original: Attached to Grievance  
 Pink: Inmate's Copy

**NEVADA DEPARTMENT OF CORRECTIONS**  
**GRIEVANT'S STATEMENT CONTINUATION FORM**

NAME: Dachad Reed I.D. NUMBER: 1106921

INSTITUTION: NNCC UNIT #: 2A

GRIEVANCE #: \_\_\_\_\_ GRIEVANCE LEVEL: 1st

GRIEVANT'S STATEMENT CONTINUATION: PG. 3 OF 3

And there is NEVER an excuse for sexual misconduct/harassment in fact the PREA act states: "The Department shall take a pro-active approach regarding the prevention, detection, response and punishment of any type of sexual misconduct." Her racial discrimination was not a narrowly tailored plan for legitimate penological interest but meant to harass and express her personal feelings toward black people.

Remedy: Can you please give me Nurse Jeanies reason for false reports; and "shady vibes" comment as well as forward the content of this complaint to the Nevada board of Nursing. thank you!

Original: Attached to Grievance  
 Pink: Inmate's Copy

**EXHIBIT 3**

The Plaintiff, Dashard Reed's  
GRIEVANCE No. 2006 311 1774  
(second level) against Defendant  
Jeanie.

SUBMITTED: MARCH 21<sup>st</sup>, 2021

**EXHIBIT 3**



**State of Nevada  
Department of Corrections**

**INMATE GRIEVANCE REPORT**

2B4A

**ISSUE ID#** 20063111774

**ISSUE DATE:** 12/11/2020

<b>INMATE NAME</b>		<b>NDOC ID</b>	<b>TRANSACTION TYPE</b>	<b>ASSIGNED TO</b>	
REED, DASHOD EVEREST		1106921	RTRN_L2	MMINEV	
<b>LEVEL</b>	<b>TRANSACTION DATE</b>	<b> DAYS LEFT</b>	<b>FINDING</b>	<b>USER ID</b>	<b>STATUS</b>
2	04/06/2021		Resolved	LVFLORES	INACTIVE

**INMATE COMPLAINT**

**OFFICIAL RESPONSE**

Mr. Reed,

You have taken action by reporting this issue to the Caseworker and it appears your complaint was forwarded to the Inspector General's Office for review. If the IG's office deems the complaint reportable they will contact the Nevada State Board of Nursing for nursing practice concerns who will then conduct their independent review. Grievance resolved.

*Michael Wines, M.D.*

*D. Reed  
4.20.21*

GRIEVANCE RESPONDER

Report Name: NVRIGR

Reference Name: NOTIS-RPT-OR-0217.4

Run Date: APR-07-21 09:42 AM

Page 1 of 6

LOG NUMBER: 20063111774NEVADA DEPARTMENT OF CORRECTIONS  
SECOND LEVEL GRIEVANCENAME: Dashod ReedI.D. NUMBER: 110692INSTITUTION: NNCCUNIT: 2B-4AI REQUEST THE REVIEW OF THE GRIEVANCE, LOG NUMBER 20063111774, ON THE SECOND LEVEL. THE ORIGINAL COPY OF MY GRIEVANCE AND ALL SUPPORTING DOCUMENTATION IS ATTACHED FOR REVIEW.

## SWORN DECLARATION UNDER PENALTY OF PERJURY

INMATE SIGNATURE: D. ReedDATE: 03.21.21WHY DISAGREE: Who ever responded at the ~~maus~~ first levelwho I assume is Nurse Jeanies boss) should know full well that as her employer you have ethical responsibility to report misconduct from your staff, as well, to the licensing board; I have not falsified or exaggeratedGRIEVANCE COORDINATOR SIGNATURE: BBDATE: 3/23/21

SECOND LEVEL RESPONSE:

I RejectedGRIEVANCE UPHELD        GRIEVANCE DENIED        ISSUE NOT GRIEVABLE PER AR 740SIGNATURE: Michael Dines, M.D. TITLE: Medical Director DATE: 4/6/21GRIEVANCE COORDINATOR SIGNATURE: LeighAnn (aw)DATE: 4/4/21INMATE SIGNATURE: D. ReedDATE: 4.20.21

THIS ENDS THE FORMAL GRIEVANCE PROCESS

Original:	To inmate when complete, or attached to formal grievance
Canary:	To Grievance Coordinator
Pink:	Inmate's receipt when formal grievance filed
Gold:	Inmate's initial receipt

RECEIVED

MAR 23 2021

NNCC

CAP/U  
3/22/21

**NEVADA DEPARTMENT OF CORRECTIONS**  
**GRIEVANT'S STATEMENT CONTINUATION FORM**

NAME: Dashad Reed I.D. NUMBER: 1106921

INSTITUTION: NNCC UNIT #: 2B-4A

GRIEVANCE #: 2006 711774 GRIEVANCE LEVEL: 2nd

GRIEVANT'S STATEMENT CONTINUATION: PG. 2 OF 3

anything in my grievance. I lived in Unit 8A for 7 months - losing canteen privileges, yard privileges, and giving up a semester of college ~~tool~~ majority of the 7 months I was harassed by Nurse Jeanie; & discriminated against at a level that irritated and became burdensome to Officers. At the second level factual allegations I allege you still have not responded to my remedy inquiring what narrowly tailored plan / legitimate penological interest did her harassment and discrimination serve? I asked Jeanie atleast 4 times to "stop" and even spoke with Case-worker Conlin about this issue. I understand your silence on that question - I simply want to work and mind my own business

Original: Attached to Grievance  
 Pink: Inmate's Copy

NEVADA DEPARTMENT OF CORRECTIONS  
GRIEVANT'S STATEMENT CONTINUATION FORM

NAME: Dashed Reed I.D. NUMBER: 1106921

INSTITUTION: NNCC UNIT #: 2B 4A

GRIEVANCE #: 20063111774 GRIEVANCE LEVEL: 2nd

GRIEVANT'S STATEMENT CONTINUATION: PG. 3 OF 3

a fair & accurate investigation and that  
all attempts at / and retaliation  
stop immediately.

I am again asking in my  
remedy: Can you "please" give me  
Nurse Jeanies purpose for false rep-  
orts & "shady vibes" comments and

please fulfill your ethical responsibility

and forward the contents to the  
Nevada Board of Nursing! -thank you!

Original: Attached to Grievance  
Pink: Inmate's Copy

**EXHIBIT 4**

The Plaintiff, Dashad Reed's  
informal complaint to Investigator  
Abeloe raising concerns of planned  
retaliation acts; and ongoing  
harassment.

SUBMITTED : February 1<sup>st</sup> 2021  
(signed by Officer J. Torres)

**EXHIBIT 4**

F-1

INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Dangred Reed	1106121	2A 4A 2B	10-21

4.) REQUEST FORM TO: (CHECK BOX)

<input type="checkbox"/> CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> MENTAL HEALTH	<input type="checkbox"/> CANTEEN
<input type="checkbox"/> EDUCATION	<input type="checkbox"/> VISITING	<input type="checkbox"/> LAW LIBRARY	<input type="checkbox"/> DENTAL
<input type="checkbox"/> LAUNDRY	<input type="checkbox"/> PROPERTY ROOM	<input type="checkbox"/> SHIFT COMMAND	<input type="checkbox"/> OTHER _____

5.) NAME OF INDIVIDUAL TO CONTACT: Live Taylor / Abbie

6.) REQUEST: (PRINT BELOW)

Live Taylor / Abbie - It has been brought to my attention, I am under investigation (cocaine). I want to ask that you please preserve all information from which your investigation stems from because of potential future litigation. In 2019 when your investigation concluded with you not being able to factually produce evidence that I was selling drugs you did a full search under the guise of searching for drugs and took my personal property and made me up for excessive property

7.) INMATE SIGNATURE Dangred Reed DOC # 1106121

8.) RECEIVING STAFF SIGNATURE Reed DATE 10-21-21

\*\*\*\*\*  
9.) RESPONSE TO INMATE

10.) RESPONDING STAFF SIGNATURE Reed DATE 10-21-21

LEGAL

1  
CPY 112INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Dashad Reed	1106921	2A 4A	1-28-21

4.) REQUEST FORM TO: (CHECK BOX)

CASEWORKER  MEDICAL  MENTAL HEALTH  CANTEEN  
 EDUCATION  VISITING  LAW LIBRARY  DENTAL  
 LAUNDRY  PROPERTY ROOM  OTHER

5.) NAME OF INDIVIDUAL TO CONTACT: Investigator Abeloe

6.) REQUEST: (PRINT BELOW) Investigator Abeloe - It has been brought to my attention; I am "under Investigation" (again). I want to ask that you please preserve all information from which your investigation stems from incase of potential future litigation. In 2019 when your investigation concluded with you not being able to factually produce evidence that showed I was "selling drugs" you did a cell search under the guise of "searching for drugs" and took my personal property and wrote me up for excessive property

7.) INMATE SIGNATURE D. Reed DOC # 1106929  
8.) RECEIVING STAFF SIGNATURE (original signed by officer, Torres) DATE (2/1/21)

## 9.) RESPONSE TO INMATE

10.) RESPONDING STAFF SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

LEGAV instead of concluding what you were investigating was not confirmed through careful observation, or systematic Inquiry - The rudimentary definition of Investigator. Taking and destroying Inmates personal effects - because you dont draw the conclusion you desire; is not the purpose of an Investigation, nor is it a investigative tactic.

I have NEVER sold drugs during my Incarceration, and neither is there any evidence to the contrary.

I just ask for a fair and accurate Investigation Mr. Abelbe I am writing you because of the fact that I am aware the retaliatory, and harassment tactics deployed here.

I request that also no retaliatory write-ups or cell searches be made against me; for a fair Investigation - and that you document and preserve any information you use to draw any conclusion you come to in this Investigation.

Your Investigation should result in a MJ-53; or me being allowed to proceed with my sentence, with-out undue burden of harassment or retaliation. as mentioned above.

**EXHIBIT 5**

Email from Defendant Conlin to  
Olivia Agle transferring the  
Plaintiff to a new job assign-  
ment in medical building; One  
day after, receiving Plaintiff's  
(first level) Grievance No. 2006 3H 1774

**EXHIBIT 5**

Reed 1106921

You were hired as a RMF Worker on April 4, 2019. In that time period you have had the opportunity to work in many areas of the RMF. This is to inform you that you have been scheduled to start work in the RMF MHU 8B. You will start on Wednesday, March 10, 2021. Please arrive at 8B right after the 5 AM count has cleared.

Thank you

Conlin CCSII

G-001

**EXHIBIT 6**

Plaintiff, Dashad Reed's  
correspondence with Defendant,  
Perry Russell. Alerting Russell to  
staff's allegations and requesting  
him to stop the "ongoing  
retaliation" against him.

SUBMITTED: MARCH 11, 2021

**EXHIBIT 6**

Received

MAR 12 2021

## INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Dashad Reed	1106921	2A 4A	Warden 3- NNCC

4.) REQUEST FORM TO: (CHECK BOX)	<input type="checkbox"/> MENTAL HEALTH	<input type="checkbox"/> CANTEEN	
<input type="checkbox"/> CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> LAW LIBRARY	<input type="checkbox"/> DENTAL
<input type="checkbox"/> EDUCATION	<input type="checkbox"/> VISITING	<input type="checkbox"/> SHIFT COMMAND	
<input type="checkbox"/> LAUNDRY	<input type="checkbox"/> PROPERTY ROOM	<input checked="" type="checkbox"/> OTHER	

5.) NAME OF INDIVIDUAL TO CONTACT: Warden Perry

6.) REQUEST: (PRINT BELOW) Warden Perry, I filed a grievance # 20063111774; and based on this grievance I was told by staff that they were told by you to "get me", and that I "should quit". Warden Perry I have not done anything wrong; I have been working in the infirmary for 2 years and have never had a complaint about my work performance. If as you say "staff is uncomfortable around me" it is due to my ability to organize my thoughts and effectively communicate their misconduct. In my 2 years I have not disrespected staff; nor have I not done anything

7.) INMATE SIGNATURE D. Reed DOC # 1106921

8.) RECEIVING STAFF SIGNATURE D. Johnson DATE 3/11/21

## 9.) RESPONSE TO INMATE

I have not said anything about you or concernd you to anyone. Who told you this? The grievance should go through the process.

10.) RESPONDING STAFF SIGNATURE [Signature] DATE 3/15/21

C-002

I was asked to do. Certainly if I have, I would not be working in the Infirmary for "2" years.

Davis V. Goord, 320 F.3d 346 (2nd Circuit, 2003) determined that the 1<sup>st</sup> Amendment protects the pursuance of grievances. Further more Caldwell V. Miller, 790 F.2d 589, 609-10 (7th Circuit 1986) states [A]n agency must conform its actions to the procedures that it has adopted, ... [because inmates have] the right to expect prison officials to follow [agency] policies and regulations. spoke with

spoke with  
Mr. Perry, I ~~had~~ Staff in 8A, and Nurse Jeanie several times trying to informally resolve this issue prior to filing a grievance - the behavior persisted. Despite Officers reviewing cameras and seeing Nurse Jeanie had falsely reported to them, even after she falsely accused me of stealing from inmates in 8A; and also accused me of taking other inmates medicine, making pruno - in addition to taking unit supplies. All of which was not true; neither did Nurse Jeanie have any evidence regarding things she alleged - she began this after I told her for the 4th time "I did not want to hear that" and asking her to "please, stop", in response to her sexual comments.

It is conveniently timed that staff say they are "Uncomfortable around me", after I filed a grievance and despite I have been working in infirmary for 2 years with-out incident.

I simply want to work and mind my own business - if I did something wrong by filing a grievance, and staff is allowed to talk to me sexually - and falsely report (campaigning for retaliation) ~~that's unacceptable~~, then I apologize. But your own A.R.'s, PREA (warnings) are to instill safeguards against such misconduct.

Every letter, word, and sentence I put in my grievance #

2006 3111774 was absolutely true - and somehow I have the ominous, and familiar feeling it is me being Investigated and about to be punished for utilizing conduct that the paramount Constitution of the United States; 1<sup>st</sup> Amendment makes provisions for.

Warden Perry I just want to continue to work - without the fear of retaliation. I have been reassigned and since moving out of 8A haven't had "any" problems.

I'm asking that you please stop the ongoing effort to retaliate against me for using protected conduct as cited earlier.

I do not want to sue; I just want to be left alone and have the veracity of my grievance investigated fairly.

*D. Bell*  
#1106921  
3.10.21

**EXHIBIT 7**

Informal Complaint from Plaintiff,  
Dashad Reed to Sgt. Woods  
regarding /requesting Inventory  
form and/or Unauthorized  
Form (required by Department  
Regulations). Submitted July 24, 2021

**EXHIBIT 7**

## INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Dashad Reed	1106921	FB 49	07 24 21

4.) REQUEST FORM TO: (CHECK BOX)	<input type="checkbox"/> MENTAL HEALTH	<input type="checkbox"/> CANTEEN
<input type="checkbox"/> CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> LAW LIBRARY
<input type="checkbox"/> EDUCATION	<input type="checkbox"/> VISITING	<input type="checkbox"/> SHIFT COMMAND
<input type="checkbox"/> LAUNDRY	<input checked="" type="checkbox"/> PROPERTY ROOM	<input type="checkbox"/> OTHER _____

5.) NAME OF INDIVIDUAL TO CONTACT: Property Room Sgt.

6.) REQUEST: (PRINT BELOW) I need a copy of the most recent  
~~copy~~ Inventory sheet put in my property file.  
 please!

- Thanks you.

I never got the recent Unauthorized  
 Or Inventory sheet of me being moved to Ad-Seg.

7.) INMATE SIGNATURE D. Reed DOC # 1106921

8.) RECEIVING STAFF SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

## 9.) RESPONSE TO INMATE

The items in question have been booked into Evidence.  
 The doc/ice will serve as your notification.

10.) RESPONDING STAFF SIGNATURE Sgt. J. DATE 7/28/21

B-008

**EXHIBIT 8**

(Second) Informal Complaint  
to Sgt. Woods

SUBMITTED: August 9th, 2021

**EXHIBIT 8**

## INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Dashed Reed	1106921	749	August 9th 2021
4.) REQUEST FORM TO: (CHECK BOX)		MENTAL HEALTH	CANTEEN
<input type="checkbox"/> CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> LAW LIBRARY	<input type="checkbox"/> DENTAL
<input type="checkbox"/> EDUCATION	<input type="checkbox"/> VISITING	<input type="checkbox"/> SHIFT COMMAND	
<input type="checkbox"/> LAUNDRY	<input checked="" type="checkbox"/> PROPERTY ROOM	<input type="checkbox"/> OTHER	
5.) NAME OF INDIVIDUAL TO CONTACT: Sgt. Woods			
6.) REQUEST: (PRINT BELOW) Sgt. Woods, I hate to bother you again - but I got your last response and you stated it is the inmates responsibility to comply with A.R. 711. A.R. 711 states excessive property is property which can not be stored properly this property was taken out of Institutional foot locker issued by the institution (with the exception of some of the books) and was therefore "stored properly" my <sup>area</sup> <del>area</del> was searched a week prior to transfer and that officer did not take or consider my property excessive.			
7.) INMATE SIGNATURE		DOC # 1106921	
8.) RECEIVING STAFF SIGNATURE		DATE	
9.) RESPONSE TO INMATE			
I have spoken w/ the officers that conducted your inventory. They <del>had</del> have stated that the items were excessive.			
10.) RESPONDING STAFF SIGNATURE		DATE 8/12/21	

**EXHIBIT** 9

(Third) Informal complaint/  
correspondence with Sgt.  
Woods  
SUBMITTED: 9/30/21

**EXHIBIT** 9

## INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Dashod Reed	1106921	TB-49	9/30/21

4.) REQUEST FORM TO: (CHECK BOX)	<input type="checkbox"/> MENTAL HEALTH	<input type="checkbox"/> CANTEEN
CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> LAW LIBRARY
EDUCATION	<input type="checkbox"/> VISITING	<input type="checkbox"/> SHIFT COMMAND
LAUNDRY	<input checked="" type="checkbox"/> PROPERTY ROOM	<input type="checkbox"/> OTHER _____

5.) NAME OF INDIVIDUAL TO CONTACT:

Sgt. Woods

6.) REQUEST: (PRINT BELOW) Dear Sgt Woods: I spoke with Lt. Miller regarding my property and he told me I could resolve the issue with you — the only property you have of mine that could have been considered "excessive" is the book/s I showed Lt. Miller my personal box (empty) and there is plenty room in my institutional locker can you please come speak w/ me.

7.) INMATE SIGNATURE

T. Reed

DOC # 1106921

8.) RECEIVING STAFF SIGNATURE

DATE \_\_\_\_\_

## 9.) RESPONSE TO INMATE

your items are connected to a Notice of Charges. The officers who inventoried your property stated the items were excessive. You are allotted 1 personal tub & 1 personal box per AR 711. Your Disciplinary Hearing will determine the outcome of the Property.

10.) RESPONDING STAFF SIGNATURE

J. J.

DATE 10/4/21

**EXHIBIT** 10

Correspondence with Defendant  
Miller and Plaintiff, Dashad  
Reed

SUBMITTED: October 3<sup>rd</sup>, 2021

**EXHIBIT** 10

## INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Dashad Reed	1106921	7B-49	10-3-21

4.) REQUEST FORM TO: (CHECK BOX)	<input type="checkbox"/> MENTAL HEALTH	<input type="checkbox"/> CANTEEN
<input type="checkbox"/> CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> LAW LIBRARY
<input type="checkbox"/> EDUCATION	<input type="checkbox"/> VISITING	<input checked="" type="checkbox"/> SHIFT COMMAND
<input type="checkbox"/> LAUNDRY	<input type="checkbox"/> PROPERTY ROOM	<input checked="" type="checkbox"/> OTHER <u>Lt</u>

5.) NAME OF INDIVIDUAL TO CONTACT: Lt Miller

6.) REQUEST: (PRINT BELOW) Lt. Miller: I was just writing you to let you know I wrote Sgt. Woods about our conversation just in case he writes you, so you wont think I'm trying to do anything crafty

You dont have to write back

7.) INMATE SIGNATURE D. Reed DOC # 1106921  
 8.) RECEIVING STAFF SIGNATURE Lt Miller DATE 10-7-21

## 9.) RESPONSE TO INMATE

I thank you. I'm having the confiscated property brought to the unit so we can "discuss" the disposition.

Lt Miller  
10-7-21

10.) RESPONDING STAFF SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

**EXHIBIT 11**

Correspondence with (Caseworker)

Ms. Adams stating as of  
11/24/21, the Plaintiff  
Dashad Reed was "still  
under investigation"

SUBMITTED: November 21, 2021  
and November 24, 2021

**EXHIBIT 11**

## INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
<u>Dashboard Reed</u>	<u>1106921</u>	<u>7B-26A</u>	<u>11-21-21</u>

4.) REQUEST FORM TO: (CHECK BOX)	<input type="checkbox"/> MENTAL HEALTH	<input type="checkbox"/> CANTEEN
<input checked="" type="checkbox"/> CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> LAW LIBRARY
<input type="checkbox"/> EDUCATION	<input type="checkbox"/> VISITING	<input type="checkbox"/> SHIFT COMMAND
<input type="checkbox"/> LAUNDRY	<input type="checkbox"/> PROPERTY ROOM	<input type="checkbox"/> OTHER _____

5.) NAME OF INDIVIDUAL TO CONTACT: Ms Adams

6.) REQUEST: (PRINT BELOW) Ms. Adams - I was writing you again, to see if you contacted the Investigators; to see what was going on with the investigation? I also wanted to know how many yard points I have?

7.) INMATE SIGNATURE D. Reed DOC # 1106921

8.) RECEIVING STAFF SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

## 9.) RESPONSE TO INMATE

nothing about the investigation itself but was told you are still under investigation as of 11/24/21 yard points = 7  
you may want to file a habeas

10.) RESPONDING STAFF SIGNATURE AA DATE 11/24/21

INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
<u>Dashad Reed</u>	<u>1106921</u>	<u>7B 26</u>	<u>11/24/21</u>

4.) REQUEST FORM TO: (CHECK BOX)	<input type="checkbox"/> MENTAL HEALTH	<input type="checkbox"/> CANTEEN
<input checked="" type="checkbox"/> CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> LAW LIBRARY
<input type="checkbox"/> EDUCATION	<input type="checkbox"/> VISITING	<input type="checkbox"/> SHIFT COMMAND
<input type="checkbox"/> LAUNDRY	<input type="checkbox"/> PROPERTY ROOM	<input type="checkbox"/> OTHER _____

5.) NAME OF INDIVIDUAL TO CONTACT: Ms Adams

6.) REQUEST: (PRINT BELOW) Dear Ms. Adams:

Can you please check on my "Investigation" and see what's going on, I spoke with Ms. Childers today (11/24/21) and she told me to speak with you about contacting the I.G office to see why I have been in Ad-Seg for 5 months? Also, how do we access the Law Library, I wrote Ms. Brannon on the 9th and haven't got a response.

7.) INMATE SIGNATURE \_\_\_\_\_ DOC # \_\_\_\_\_

8.) RECEIVING STAFF SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

## 9.) RESPONSE TO INMATE

I sent an email to your investigators to see if you are still pending. You may want to file a HUM to speak to them

10.) RESPONDING STAFF SIGNATURE CH DATE 11/29/21

**EXHIBIT 12**

DECLARATION UNDER PENALTY  
OF PERJURY FROM: CHRISTOPHER  
DILLON (AKA "FLAME")

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Executed: January 6<sup>th</sup>, 2022



**EXHIBIT 12**

AFFIDAVIT

State of Nevada)

: ss.

Carson City )

I, CHRISTOPHER DILLON, the undersigned, do hereby swear, under penalty of perjury, that the following assertions are true and correct to the best of my knowledge:

1. I Christopher Dillon #75673 NEITHER  
UNDER MY OWN VOLITION OR UNDER THE  
INSTRUCTION OF (DASHED) REE.), HAVE SOLD,  
BARTERED OR TRADED DRUGS. IN ADDITION  
TO THIS I HAVE NEVER FACILITATED OR  
EXECUTED A DRUG TRANSACTION WITH  
KEVIN GILL ON MY OWN VOLITION, OR  
FOR THE BENEFIT/ OR PURPOSE OF  
(DASHED) REE.).

Executed on this 6<sup>th</sup> day of January, 2022, at Northern Nevada Correctional Center, Carson City, Nevada, under penalty of perjury, in accordance with Nevada Revised

Statute 208.165. (Execution of instrument by a prisoner) and 28 USCS 1746.

Ch. Dillon  
(Signature)

**EXHIBIT** 13

Correspondence with Investigator  
General ("IG") office requesting  
a polygraph test.

SUBMITTED: January 18<sup>th</sup>, 2022

**EXHIBIT** \_\_\_\_\_

1B301057

100-1194

INMATE REQUEST FORM

1.) INMATE NAME	DOC #	2.) HOUSING UNIT	3.) DATE
Dashed Reed	1106921	1B3.26A	1/18/22

4.) REQUEST FORM TO: (CHECK BOX)	<input type="checkbox"/> MENTAL HEALTH	<input type="checkbox"/> CANTEEN
<input type="checkbox"/> CASEWORKER	<input type="checkbox"/> MEDICAL	<input type="checkbox"/> LAW LIBRARY
<input type="checkbox"/> EDUCATION	<input type="checkbox"/> VISITING	<input type="checkbox"/> SHIFT COMMAND
<input type="checkbox"/> LAUNDRY	<input type="checkbox"/> PROPERTY ROOM	<input checked="" type="checkbox"/> OTHER

5.) NAME OF INDIVIDUAL TO CONTACT: SP.G. office

6.) REQUEST: (PRINT BELOW) I spoke with officer Zacharias today and he told me that you guys can perform polygraph test - I would like to take (1) NO staff member has introduced class to the facility for me and I NEVER sold Kevin Griff drugs directly or through a 3rd party. Can you please give me and Kevin Griff polygraph test.

7.) INMATE SIGNATURE D. Reed DOC # 1106921

8.) RECEIVING STAFF SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

## 9.) RESPONSE TO INMATE

At this time, the ADOS will not be providing a polygraph exam for this subject

10.) RESPONDING STAFF SIGNATURE [Signature] DATE 2.2.22

**EXHIBIT 14**

Notice of Charges (NOC") awarded  
to Plaintiff, Rashad Reed by  
Defendant Cottrell on July 27, 2021  
(3 days after Plaintiff complained;  
see; exhibits 7-9)

**EXHIBIT 14**



**State of Nevada**  
**Department of Corrections**  
**DISCIPLINARY FORM I**  
**NOTICE OF CHARGES**

**INMATE INFORMATION**

**INMATE NAME:** REED, DASHOD 1106921

**CURRENT LOCATION** NNCC-U7-B-49-A; : ;NC

**OIC#:** 498351 **IR#:** IR-2021-NNCC-001982

**VIOLATION INFORMATION**

**CHARGING EMPLOYEE** Coltrin

**DATE OF INCIDENT:** 07/27/2021

**DATE CHARGES WRITTEN:** 07/27/2021

**CHARGES AND EVIDENCE**

Chrg	Description	Evidence	Evidence Disposition
G14:	Failure to Follow Rules and Regs		

**REPORT OF VIOLATION**

During a property roll up for inmate Reed, Dashod # 1109621 excess items are as follows:

1 altered jeans, 1 blue polo shirt, 1 suspenders, 2 velcro straps, 1 gloves, 2 pillows, 2 pillow cases, 20 books, 1 headphones, 39 bags food, 3 boxes of food, 56 soap, 8 toothpaste, 11 deodorant, 15 shampoo/conditioner, 8 body wash, 15 lotion, 5 mouth wash, 4 dish soap, 10 hair product, 4 lip balm, 6 fish oil, 1 laundry soap, 2 broken pair of glasses/cases, 3 highlighters, 1 expo marker, 1 face cream, 1 work boots, 1 altered state sheet, 1 loofa. End of report.

**CHARGING EMPLOYEE SIGNATURE**

**SUPERVISOR SIGNATURE**

A handwritten signature in black ink, appearing to read "S. Coltrin".

**SERVICE OF NOTICE OF CHARGES**

**DISTRIBUTION**

**DATE OF SERVICE:** \_\_\_\_\_ **TIME OF SERVICE:** \_\_\_\_\_

Primary Hearing Officer (Original)

**PRINTED NAME OF HEARING OFFICER** \_\_\_\_\_

Charging employee (Copy)

**SIGNATURE OF HEARING OFFICER** \_\_\_\_\_

Inmate (Copy)

**SIGNATURE OF INMATE** \_\_\_\_\_

(Signature indicates receipt of notice only. It is not a plea; refusal to sign should be noted)